### West Virginia Department of Environmental Protection Division of Air Quality

## **Fact Sheet**



# For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: R30-03900075-2012 Application Received: June 21, 2011 Plant Identification Number: 03900075 Permittee: Cranberry Pipeline Corporation Facility Name: Horsemill Compressor Station Mailing Address: 102 Third Street

Glasgow, WV 25086

Physical Location: Cedar Grove, Kanawha County, West Virginia

UTM Coordinates: 461.61 km Easting • 4232.07 km Northing • Zone 17

Directions: From U.S. Route 60 in Cedar Grove, turn onto Kelly's Creek Road. Travel approximately 0.25 miles and turn left into Horsemill Hollow.

#### **Facility Description**

Horsemill Compressor Station is a natural gas gathering facility covered by Standard Industrial Classification (SIC) Code 1389. The station has the potential to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year. The station consists of one (1) 600 HP natural gas compressor engine, one (1) 800 HP natural gas compressor engine, a glycol dehydration unit and 4 tanks of various sizes.

#### **Emissions Summary**

Plantwide Emissions Summary [Tons per Year]				
Regulated Pollutants	<b>Potential Emissions</b>	2010 Actual Emissions		
Carbon Monoxide (CO)	24.40	3.90		
Nitrogen Oxides (NO <sub>X</sub> )	202.71	32.31		
Particulate Matter (PM <sub>10</sub> )	2.16	0.14		
Total Particulate Matter (TSP)	2.16	0.14		
Sulfur Dioxide (SO <sub>2</sub> )	0.04	< 0.01		
Volatile Organic Compounds (VOC)	18.84	2.06		
$PM_{10}$ is a component of TSP.				
Hazardous Air Pollutants	Potential Emissions	2010 Actual Emissions		
Total HAPs	2.14	0.43		

Some of the above HAPs may be counted as PM or VOCs.

#### **Title V Program Applicability Basis**

This facility has the potential to emit over 100 tons of NOx. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Horsemill Compressor Station is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

#### **Legal and Factual Basis for Permit Conditions**

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Control of particulate matter from indirect
		heat exchangers
	45CSR6	Open burning prohibited
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction, modification, relocation, etc
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent
		information such as annual emission
		inventory reporting
	45CSR30	Operating permit requirement
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 Subpart HH	NESHAP: Oil & Natural Gas Production
		Facilities.
	40 C.F.R. Part 63, Subpart ZZZZ	RICE MACT
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	Control of fugitive particulate matter

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

#### **Active Permits/Consent Orders**

Permit or	Date of	Permit Determinations or Amendments That
Consent Order Number	Issuance	Affect the Permit (if any)
R13-2808A	4/11/11	N/A

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

#### **Determinations and Justifications**

Changes made to the most recent version to this Title V Permit are summarized below:

#### 1. Miscellaneous

The year installed date for Emission Units Engine #1 and #2 have been changed from 1993 to 1983 and 1985, respectively. This corrects the previous version.

The Greenhouse Gas Reporting Requirements have been removed from Conditions 3.1.10 and 3.5.11. Updates have been made to the Permit boilerplate.

2. 40CFR63, Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The facility is subject to the area source requirements of this Subpart. The compliance date for these conditions unless specified elsewhere in the Permit is October 19, 2013. The facility has two engines (#1 and #2) that are subject to this Subpart. They are non-emergency four stroke rich burn engines that are greater than 500 brake horsepower and operate more than 24 hours per year.

Condition 7.1.1 has been added and limits the formaldehyde concentration emissions.

Condition 7.1.2 has been added to ensure proper operation of the control device.

Condition 7.1.3 has been added to show initial compliance of the formaldehyde concentration.

Condition 7.1.4 has been added to ensure proper operation and maintenance of the affected units.

Condition 7.1.5 has been added to demonstrate continuous compliance with the formaldehyde concentration limits.

Condition 7.2.1 has been added to specify monitoring CO and either  $CO_2$  or oxygen at the inlet and outlet of the control device, as well as proper operation of the monitoring device.

Condition 7.2.2 has been added to require continuous monitoring to show compliance with the formaldehyde emissions, and to not use bad data.

Condition 7.3.1 has been added and specifies the testing that is required for the initial performance test.

Condition 7.3.2 has been added and specifies how the test is conducted.

Condition 7.3.3 has been added and requires subsequent performance tests be completed every 8,760 hours, or 3 years, whichever comes first.

Condition 7.4.1 has been added and requires recordkeeping for notification, reporting, performance tests, and the continuous monitoring data.

Condition 7.5.1 has been added and requires reports for things such as deviations, malfunctions, and compliance reporting.

Condition 7.5.2 has been added and specifies the dates of notifications.

#### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

1. Greenhouse Gas Tailoring Rule

This is a renewal Title V Permit and there have been no changes that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

#### **Request for Variances or Alternatives**

None

#### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

#### **Comment Period**

Beginning Date: January 26, 2012 Ending Date: February 27, 2012

All written comments should be addressed to the following individual and office:

Mike Egnor
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57<sup>th</sup> Street SE
Charleston, WV 25304

#### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

#### **Point of Contact**

Mike Egnor West Virginia Department of Environmental Protection Division of Air Quality 601 57<sup>th</sup> Street SE Charleston, WV 25304

Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478

#### **Response to Comments (Statement of Basis)**

(Choose) Not applicable.

#### OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.